

Exhibit A

2001 Ross Avenue
Dallas, TX 75201-2911
Tel 214.698.3100
www.gibsondunn.com

Mike Raiff
Direct: +1 214.698.3350
Fax: +1 214.571.2927
MRaiff@gibsondunn.com

April 7, 2022

VIA CERTIFIED MAIL, RETURN RECEIPT REQUESTED

The Honorable Merrick Garland
Attorney General of the United States
U.S. Department of Justice
950 Pennsylvania Avenue, N.W.
Washington, DC 20530-0001

Re: Notice of Proposed Settlement in *Chun, et al. v. Fluor Corp., et al.*, United States District Court, Northern District of Texas, No. 3:18-CV-01338-X (Consolidated)

Dear Attorney General Garland:

Pursuant to 28 U.S.C. § 1715, enacted as part of the Class Action Fairness Act of 2005, Defendants Fluor Corporation (“Fluor”), David T. Seaton, Biggs C. Porter, Bruce A. Stanski, Matthew McSorley, Gary G. Smalley, Carlos M. Hernandez, D. Michael Steuert, and Robin K. Chopra (collectively, “Defendants”) hereby provide your office with notice of a proposed settlement in the above-referenced matter (the “Litigation”) pending in the United States District Court for the Northern District of Texas (the “Court”). The Litigation asserts claims under Sections 10(b) and 20(a) of the Securities Exchange Act of 1934, 15 U.S.C. § 78a, et seq. The case does not involve any state law claims.

The proposed settlement class (“Class”) consists of all persons or entities that purchased, or otherwise acquired, the common stock of Fluor (NYSE: FLR) between August 14, 2013 and February 14, 2020, both dates inclusive (“Settlement Class Period”). Excluded from the Settlement Class are Defendants; members of the immediate families of the Individual Defendants; Fluor’s subsidiaries and affiliates; any person who was an officer or director of Fluor during the Settlement Class Period; any entity in which any Defendant has a controlling interest; the judges presiding over the Action and the immediate family members of such judges; and the legal representatives, heirs, successors and assigns of any such excluded person or entity. Also excluded from the Settlement Class are those Persons who submit a request for exclusion from the Settlement Class in such form and manner, and within such time, as the Court shall prescribe.

In conjunction with this notice, please find copies of the following documents on the enclosed CD provided with this letter:

1. Complaint for Violation of the Federal Securities Laws (Dkt. No. 1) (May 25, 2018);

The Honorable Merrick Garland
April 7, 2022
Page 2

2. Consolidated Complaint for Violation of the Federal Securities Laws (Dkt. No. 47) (Mar. 08, 2019);
3. Memorandum Opinion and Order, dismissing Plaintiffs' complaint without prejudice (Dkt. No. 89) (Mar. 05, 2020);
4. First Amended Consolidated Complaint for Violation of the Federal Securities Laws (Dkt. No. 90) (Apr. 02, 2020);
5. Memorandum Opinion and Order, granting in part and denying in part Defendants' motion to dismiss (Dkt. No. 140) (May 05, 2021);
6. Lead Plaintiff's Unopposed Motion for Preliminary Approval of Settlement and Approval of Notice to the Settlement Class (Dkt. No. 158) (Mar. 31, 2022) and all concurrently filed documents, including:
 - a. Proposed Stipulation of Settlement (Dkt. No. 159-1)
 - b. Proposed Order Preliminarily Approving Settlement and Providing for Notice (Dkt. No. 159-2)
 - c. Proposed Notice of Proposed Settlement of Class Action, Motion for Attorneys' Fees and Expenses, and Settlement Class Hearing (long form) (Dkt. No. 159-3)
 - d. Proposed Court Ordered Legal Notice (short form) (Dkt. No. 159-4)
 - e. Proposed Notice of Pendency and Proposed Settlement of Class Action (Dkt. No. 159-5)
 - f. Proposed Proof of Claim and Release Form (Dkt. No. 159-6)
 - g. Proposed Order and Final Judgment (Dkt. No. 159-7)

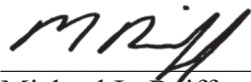
As reflected in Paragraph 2.13 of the proposed Stipulation of Settlement, the parties entered into a confidential Supplemental Agreement that permits Defendants to terminate the proposed settlement in the event that requests for exclusion are received from persons who otherwise would be members of the Settlement Class and who, in the aggregate, purchased or acquired during the Settlement Class Period more than a specified percentage of all shares eligible for compensation in the Settlement. The Supplemental Agreement and/or any of its terms may be disclosed *in camera* to the Court at the Court's request.

The Honorable Merrick Garland
April 7, 2022
Page 3

Defendants do not have access to information sufficient to identify and provide the names of putative class members who reside in each state, or to estimate the number of putative class members residing in each state. A complete list of putative class members does not exist, and the claims administrator will therefore endeavor to notify potential class members by publishing notice once over a newswire service that distributes nationally in the United States, and by sending direct mail notice to all those who can be reasonably identified, including by disseminating notice through brokers and other nominees who likely hold shares in the name of the class members who are beneficial owners of the securities. Accordingly, it is not possible at this time to provide a reasonable estimate of the number of Class members residing in each state or the proportionate share of the claims of such Class members to the entire settlement.

Counsel for the Class filed the parties' proposed Stipulation of Settlement and associated documents with the Court on March 31, 2022. At this time, there are no written judicial opinions relating to the proposed notice to the Class, the preliminary or final approval of the settlement, or other matters discussed in 28 U.S.C. § 1715(b)(3)-(6), and no judicial hearings in the matter are currently scheduled. Notice of scheduled hearings or relevant judicial opinions may be found by visiting the "PACER" online docket for the above-captioned matter at <https://pacer.login.uscourts.gov/cgi-bin/login.pl>, or by visiting the settlement website, www.FluorSecuritiesSettlement.com.

Should you have any questions regarding this matter, please do not hesitate to contact me directly.



Michael L. Raiff
GIBSON DUNN & CRUTCHER LLP
2001 Ross Ave., Suite 2100
Dallas, TX 75201-2923
Tel: (214) 698-3350
Fax: (214) 571-2900
Email: MRaiff@gibsondunn.com

Counsel for Defendants